DeMarco•Mitchell, PLLC Robert T. DeMarco Michael S. Mitchell 12770 Coit Road, Suite 850 Dallas, TX 75251 T 972-991-5591 F 972-346-6791

# IN THE UNITED STATES BANKRUPTCY COURT NORTHERN DISTRICT OF TEXAS FORT WORTH DIVISION

IN RE:		Case No.:	25-40641
Van Scoit Group LLC		Chapter: [JOINT ADM	11 INISTRATION REQUESTED
	Debtor <sup>1</sup> .		
IN RE:		Case No.:	25-40642
Van Scoit Services LLC		Chapter: [JOINT ADM	11 INISTRATION REQUESTED
	Debtor.		

## DEBTORS' EXPEDITED MOTION FOR AUTHORITY TO PAY CERTAIN PREPETITION WAGE AND TAX CLAIMS

#### TO THE HONORABLE UNITED STATES BANKRUPTCY JUDGE:

Services"), Debtors and Debtors in possession in the above-styled and numbered cases (collectively, the "<u>Debtors</u>"), and file this *Debtors' Expedited Motion for Authority to Pay Certain Prepetition Wage and Tax Claims* ("<u>Motion</u>") by and through the undersigned attorney. The facts and circumstances supporting this Motion are set forth in the concurrently filed *Declaration of Eric Schaffer in Support of Debtor's First Day Motions* ("<u>Declaration</u>"). In further support of this Motion the Debtor respectfully avers as follows:

#### I. <u>JURIS</u>DICTION

<sup>&</sup>lt;sup>1</sup> The Debtors in these proceedings (including their respective taxpayer identification numbers) are: Van Scoit Group, LLC, (75-2953854), and Van Scoit Services, LLC, (93-2023484). The Debtors' corporate headquarters are: 8820 Trinity Vista Trl, Hurst, TX 76053.

- 1. The Court has jurisdiction over the subject matter of this Motion pursuant to 28 U.S.C. §1334(b) and the standing order of reference of the District Court. This matter is a core proceeding. 28 U.S.C. §§ 157(b)(1), (b)(2)(M).
  - 2. Venue in this Court is proper under 28 U.S.C. §§ 1408 and 1409.
- 3. The bases for the relief requested herein are sections 105(a), 363(b)(1) and 507(a)(4) of title 11 of United States Code, 11 U.S.C. §§ 101-1532 (the "Bankruptcy Code").

#### II. BACKGROUND

- 4. This bankruptcy case was commenced by the filing of this voluntary petition for relief under Chapter 11 of the Bankruptcy Code on **February 10, 2025** (the "Petition Date").
- 5. No trustee<sup>2</sup> or examiner has been appointed, and no official committee of creditors has yet been established.
- 6. Information regarding the Debtor's history and business operations, capital structure, and the events leading up to the commencement of these bankruptcy cases can be found in the Declaration, which is incorporated herein by reference.

# III. FACTS SPECIFIC TO RELIEF REQUESTED A. Employee Payroll

- 7. The Debtor's employees are paid every week. Debtor's next payroll is made Friday, **February 28, 2025**.
  - 8. The total GROSS wages due and owing all employees of the Debtors is as follows:

Debtor	Amount	
Van Scoit Group LLC	\$26,084.29	
Van Scoit Services LLC	\$10,738.85	

<sup>&</sup>lt;sup>2</sup> Debtors anticipate the appointment of a Subchapter V Trustee within 48 hours of the Petition date.

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- 9. The Debtors need to continue to pay the wages due and owing its employees on a timely basis. The granting of such relief is in the best interest of the bankruptcy estate and all interested parties.
- 10. The Gross wages due and owing all employees of the Debtors are substantially less than the per creditor limits set forth in 11 U.S.C. § 507(a)(4).

#### B. <u>Payroll Tax Obligations</u>

- 11. In connection with the aforementioned payroll obligations, the Debtors have incurred certain tax obligations.
  - 12. The Debtors are current on their respective tax obligations.
- 13. The Debtors estimate their respective tax obligation in connection with the foregoing wage obligations is as follows:

Debtor	Amount	
Van Scoit Group LLC	\$5,887.59	
Van Scoit Services LLC	\$2,472.31	

14. Attached hereto as Exhibit "A" and incorporate herein by this reference is a detail of the payroll obligations for the Debtor.

#### IV. RELIEF REQUESTED

15. By this Motion, the Debtors request the entry of an order pursuant to Sections 105(a), 363(b)(1) and 507(a)(4) of the Bankruptcy Code authorizing, but not requiring, the Debtors, in accordance with its stated polices and in its ordinary course, to immediately pay or otherwise honor the Debtors' prepetition wage and tax obligations.

#### V. BASIS FOR RELIEF

#### A. Prepetition Payroll

- 16. A bankruptcy court may authorize the payment of pre-petition wages and benefits when necessary. Payment of pre-petition wages, on an immediate basis, is rooted in the "doctrine of necessity," which doctrine, courts have consistently adopted where the failure to do so would jeopardize the Debtors' chance of reorganization.
- order, process, or judgment that is necessary or appropriate to carry out the provisions of this title." 11 U.S.C. § 105(a). Section 105(a) codifies the bankruptcy court's inherent equitable powers. See Marrama v. Citizens Bank of Mass., 127 S.Ct. 1105 (February 21, 2007)(Section 105 was relied upon heavily by the majority of the Court in ruling that there is no absolute right to convert a chapter 7 bankruptcy case under § 706 of the Bankruptcy Code despite the clear textual reading of the statute); *In re Feit & Dexler, Inc.*, 760 F.2d 406 (2nd Cir. 1985).
- 18. The relief requested herein is supported by the well-established "necessity of payment" doctrine. *See, In re Ionosphere Clubs, Inc.,* 98 B.R. 174, 175 176 (Bankr. S.D.N.Y. 1989) citing *Miltenberger v. Logansport, C. & S. W. R. Co.,* 106 U.S. 286 (1882). The "necessity of payment" doctrine "teaches no more than, if payment of a claim that arose prior to reorganization is essential to the continued operation of the [business] during the reorganization, payment may be authorized even if it is made out of corpus." *In re Lehigh & New England Railway Company,* 657 F.2d 570, 581 (3rd Cir. 1981); *see also Pension Benefit Guarantee Corporation v. Sharon Steel Corp. (In re Sharon Steel Corp.),* 159 B.R. 730, 736 (Bankr. W.D.Pa. 1993). Similarly, the court in Ionosphere stated the "necessity of payment" doctrine "recognizes the existence of

the judicial power to authorize a debtor in a reorganization case to pay prepetition claims where such payment is essential to the continued operation of the debtor." *Ionosphere*, 98 B.R. at 176.

- 19. The lonosphere case is of particular import to the case sub judice, since Judge Lifland relied on his equitable powers under section 105 and, in particular, the "necessity of payment" doctrine, to authorize the payment of wages, salaries, medical benefits and business expenses to its then current employees. *Ionosphere*, 98 B.R. at 176. Judge Liffland recognized that employee retention and positive morale were two critical factors to a successful reorganization, which factors are enhanced when payroll is paid timely. *Ionosphere*, 98 B.R. at 176.
- 20. Accordingly, the "necessity of payment" doctrine authorizes the Debtors to pay the amounts they seek authority to pay by this Motion. The Debtors believe all amounts they seek to pay are entitled to priority claim status under section 507(a)(4) of the Bankruptcy code and individually do not exceed the dollar limits set forth therein. As such, the Debtors will likely have to pay all such claims in full to confirm a plan of reorganization. *See* 11 U.S.C. § 1129(a)(9)(B). The relief requested herein, if granted, affects only the timing and not the amount for most such claims.
- 21. If the Debtors miss payroll, many of the employees will face severe financial hardship. Moreover, the Debtors believe that if they are unable to honor their payroll obligations, employee morale and loyalty will be jeopardized at a time when employee support is critical. The loss of any employee has the potential to seriously jeopardize the Debtors' reorganization efforts.

- 22. The payment of the amounts requested herein pursuant to the "necessity of payment" doctrine is in the best interest of the Debtors and thier bankruptcy estates. *See Lehigh*, 657 F.2d at 581.
- 23. Nothing contained herein shall constitute a request for authority to assume or reject any agreements, policies or procedures relating to employee wages.

#### B. Prepetition Payroll Tax Obligations

- taxes which are required to be collected from third parties and held in trust for payment to the appropriate taxing authority. *See e.g. In re Al Copeland Enterprises, Inc.*, 133 B.R. 837 (Bankr. W.D. Tex. 1991), *aff'd*, 991 F.2d 233 (5th Cir. 1993) (the debtor was obligated to pay Texas sales taxes plus interest because such taxes were "trust fund" taxes). To the extent the Taxes are "trust fund" taxes, they are not property of the bankruptcy estate pursuant to Section 541 of the Bankruptcy Code. *Begier v. I.R.S.*, 496 U.S. 53, 67 (1990) ("payments of trust fund taxes to the IRS from its general accounts were not transfers of "property of the debtor," but were instead transfers of property held in trust for the Government..."); *Equalnet Communications, Corp.*, 258 B.R. 368, 370 (Bankr. S.D.Tex. 2000) ("With respect to taxes, certain prepetition tax claims, such as sales taxes, could be trust fund claims. Obviously, the legal right to payment of such claims at any time appears irrefutable."). As such, the Debtors have no beneficial interest in any such "trust fund" taxes.
- 25. Nonetheless, even if the taxes do not constitute "trust fund" taxes, the Debtors believe the payment of such taxes is appropriate under Section 105(a) of the Bankruptcy Code. Pursuant to Section 105(a) of the Bankruptcy Code, "[t]he court may issue any order, process, or

judgment that is necessary or appropriate to carry out the provisions of this title." 11 U.S.C. § 105(a).

- 26. The United States Supreme Court has authorized bankruptcy courts to use the equitable powers granted in Section 105(a) to authorize the payment of certain prepetition obligations where, as here, any nonpayment could harm the Debtors' reorganization efforts. *NLRB v. Bildisco & Bildisco*, 465 U.S. 513, 528 (1984) (section 105 empowers the bankruptcy court to authorize the payment of prepetition obligations when such payments are necessary to facilitate the rehabilitation of the debtor).
- 27. Numerous courts have used Section 105(a) to authorize payment of a debtor-in-possession's prepetition obligations where, as here, such payment is an essential element of the preservation of the Debtor's potential for rehabilitation. *In re Just For Feet, Inc.*, 42 B.R. 821, 824 (D.Del.,1999); *Equalnet Communications*, 258 B.R. at 370; *In re Synteen Technologies*, Inc., 2000 WL 33709667, page 2 (Bankr. D.S.C. 2000) *In re Ionosphere Clubs, Inc.*, 98 B.R. 174, 176 (Bankr.S.D.N.Y.1989)).
- 28. Without question, the payment of the taxes is necessary to avoid administrative difficulties. Withholding a tax payment could cause the taxing and other authorities to take precipitous action, including increased audits and lift stay motions necessitating much time and attention of the Debtors and their counsel at the critical early stages of this Chapter 11 case.
- 29. Finally, most, if not all, of the taxes are entitled to priority status under Section 507(a)(8) of the Bankruptcy Code. The payment of the prepetition portion of the taxes at this juncture more likely than not only affects the timing of the payment and not the amount to be

received by any tax claim holders. Therefore, other creditors and/or parties-in-interest are not

prejudiced by the relief requested herein if granted.

VI. BANKRUPTCY RULE 6003

30. Bankruptcy Rule 6003 provides that the relief requested in this Motion may be

granted if the "relief is necessary to avoid immediate and irreparable harm." Bankruptcy Rule

6003. Immediate and irreparable harm exists where the absence of relief would impair a debtor's

ability to reorganize or threaten the debtor's future as a going concern. See In re Ames Dep't

Stores, Inc., 115 B.R. 34, 36 n.2 (Bankr. S.D.N.Y. 1990) (discussing the elements of "immediate

and irreparable harm" in relation to Bankruptcy Rule 4001(c)(2)).

31. The Debtors respectfully submit Bankruptcy Rule 6003(b) has been satisfied and

the relief requested herein is necessary to avoid immediate and irreparable harm to the Debtor

and its bankruptcy estate.

VII. BANKRUPTCY RULE 6004

32. The Debtors seek a waiver of the notice requirements of Bankruptcy Rule 6004(a)

and the fourteen (14) day stay of any order authorizing the use, sale, or lease of property under

Bankruptcy Rule 6004(h) in light of the exigent nature of the relief requested herein.

WHEREFORE, PREMISES CONSIDERED, the Debtors respectfully request the Court

authorize, but not require, the Debtors to pay or otherwise honor the Debtors' pre-petition wage

and salary obligations; and for such other and further relief to which the Debtor may be justly

entitled.

Respectfully submitted,

Dated: February 25, 2025

/s/ Robert T. DeMarco

#### DeMarco • Mitchell, PLLC

Robert T. DeMarco, Texas Bar No. 24014543

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Dallas, TX 75251 T 972-991-5591 F 972-346-6791

**Proposed** Counsel for Debtors and Debtors in Possession

#### **CERTIFICATE OF CONFERENCE**

The undersigned counsel hereby certifies that, prior to the filing of this Motion, he conferred with the following parties concerning their respective positions on the Motion:

Attorney	Position
Erin Schmidt, counsel for the United States Trustee	No position

#### **CERTIFICATE OF SERVICE**

The undersigned counsel herby certifies that true and correct copies of the foregoing pleading and all attachments were served upon all parties listed below in accordance with applicable rules of bankruptcy procedure on this **25**<sup>th</sup> **day of February 2025**. Where possible, service was made electronically via the Court's ECF noticing system or via facsimile transmission where a facsimile number is set forth below. Where such electronic service was not possible, service was made via regular first-class mail.

#### **DEBTORS**

Van Scoit Group, LLC 8820 Trinity Vista Trl Hurst, TX 76053 Van Scoit Services, LLC 8820 Trinity Vista Trl Hurst, TX 76053

#### **TRUSTEES**

Office of the United States Trustee Earle Cabell Federal Building 1100 Commerce Street, Room 976 Dallas, TX 75242

#### ADDITIONAL PARTIES IN INTEREST AND/OR PARTIES REQUESTING NOTICE

Schlotzsky's

#### **SEE ATTACHED MATRIX**

### /s/ Robert T. DeMarco

#### DeMarco • Mitchell, PLLC

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#### **Van Scoit Services**

		Taxes				
(	Gross Pay	Federal	SS	Medicare	Net Pay	<b>Employer Taxes</b>
Morales	\$337.00	\$0.00	-\$20.89	-\$4.89	\$362.78	\$36.90
Ojeda, A	\$255.67	\$0.00	-\$15.85	-\$3.71	\$275.23	\$27.99
Ojeda, A	\$331.44	\$0.00	-\$20.55	-\$4.81	\$356.80	\$36.30
Garcia, <i>F</i>	\$159.32	\$0.00	-\$9.87	-\$2.31	\$171.50	\$17.44
Mendez,	\$458.73	-\$5.00	-\$28.44	-\$6.65	\$498.82	\$50.22
Rodrigu	\$75.00	\$0.00	-\$4.65	-\$1.09	\$80.74	\$8.22
Ojeda, E	\$230.60	\$0.00	-\$14.29	-\$3.35	\$248.24	\$25.26
Cabrera,	\$849.38	-\$44.00	-\$52.66	-\$12.32	\$958.36	\$93.01
Reyes, G	\$456.63	-\$5.00	-\$28.31	-\$6.62	\$496.56	\$50.00
Hernanc	\$1,184.40	-\$84.00	-\$73.43	-\$17.17	\$1,359.00	\$129.69
Cabrera,	\$1,253.75	-\$92.00	-\$77.73	-\$18.18	\$1,441.66	\$137.28
Cabrera,	\$930.00	-\$53.00	-\$57.66	-\$13.49	\$1,054.15	\$101.84
Fraga, La	\$276.40	\$0.00	-\$17.14	-\$4.01	\$297.55	\$30.27
Ojeda, №	\$1,560.00	-\$109.00	-\$96.72	-\$22.62	\$1,788.34	\$170.82
Mendoz	\$1,181.25	-\$83.00	-\$73.24	-\$17.13	\$1,354.62	\$129.25
Paramo,	\$268.88	\$0.00	-\$16.67	-\$3.89	\$289.44	\$29.43
Ojeda, R	\$552.32	\$0.00	-\$34.25	-\$8.01	\$594.58	\$60.48
Rodrigu	\$378.08	\$0.00	-\$23.44	-\$5.48	\$407.00	\$41.39
TOTAL	\$10,738.85	-\$475.00	-\$665.79	-\$155.73	\$12,035.37	\$1,175.79

TAXES	\$1,296.52	\$1,175.79
TOTAL	\$2,472.31	

# **EXHIBIT "A"**

### **PAYROLL JOURNAL**

0942 1815-8665 Van Scoit Group LLC

EMPLOYEE NAME	HOURS,	EARNINGS, I	REIMBURSEM	IENTS & OTHER	PAYMENTS	WITHHOLDINGS	DEDUCTIONS	NET PAY	•
ID	DESCRIPTIO	N RATE	HOURS	EARNINGS	REIMB & OTHER PAYMENTS			ALLOCATIO	NS
**** 1 CASHIER-SD Lopez, Rosa 195	Hourly Overtime	13,0000 19,5000	126,9800 28,8500	1,650.74 562.58		Social Security 137:22 Medicare 32:10 Fed Income Tax 187:19			1,856.81
**** 3 MANAGER	EMPLO	DYEE TOTAL	155,8300	2,213,32		356;51		Net Pay	1,856,81
Melendez, Irma 205	Salary		M80.0000	2,400.00		Social Security 148:80 Medicare 34:80 Fed Income Tax 190:73		Check # Unknown Check Amt	2,025.67
Van Scoit, Valeri 328	EMPL0 Salary	DYEE TOTAL	80;0000	2,400 <u>,00</u> 1,000.00		374;33   Social Security   62:00   Medicare   14:50   Fed Income Tax   42:31		Net Pay Check # Unknown Check Amt	2,025,67 881 19
	EMPLO	OYEE TOTAL		1,000.00		118,81		Net Pay	881 19
**** 4 KITCHEN-SD Barbosa, Marcela C 115	Hourly	12.0000	109.6000	1,315.20		Social Security 81:54 Medicare 19:07 Fed Income Tax 79:42		Check # Unknown Check Amt	1,135.17
		OYEE TOTAL	109 6000	1,315 20		180;03		Net Pay Check # Unknown	1,135.17
Garcia, Imelda 160	Hourly	14,0000	108,9400	1,525.16		Social Security         94;56           Medicare         22;12           Fed Income Tax         104;62		Check # Unknown Check Amt	1,303.86
	EMPLO	DYEE TOTAL	108 9400	1,525 16		221,30		Net Pay Check # Unknown	1,303.86
Garcia, Lorena 165	Hourly	14,0000	64,6000	904.40		Social Security         56,08           Medicare         13,11           Fed Income Tax         32,75		Check # Unknown Check Amt	802.46
	EMPLO	DYEE TOTAL	64 6000	904 40		101 94		Net Pay	802.46
**** 5 BAKER-SD Melendez, Mario 210	Salary		M80.0000	2,100.00		Social Security 130,20 Medicare 30,45 Fed Income Tax 213,29		Check # Unknown Check Amt	1,726.06
	EMPLO	OYEE TOTAL	80.0000	2,100,00		373:94		Net Pay	1,726,06
**** 6 STAFF Garcia, Norma 76813	Hourly Overtime	12.0000 18.0000	131,1000 27,3900	1,573,20 493,02		Social Security 128,10 Medicare 29:96 Fed Income Tax 169:54		Check # Unknown Check Amt	1,738.62
	EMPLO	OYEE TOTAL	158 4900	2,066,22		327:60		Net Pay Check # Unknown	1,738,62
Lopez, Christian A 76812	Hourly	12.0000	91 2200	1,094.64		Social Security         67;87           Medicare         15;87           Fed Income Tax         52;95		Check # Unknown Check Amt	957 95
	EMPLO	DYEE TOTAL	91 2200	1,094 64		136:69		Net Pay	957,95



**0942 1815-8665** Van Scoit Group LLC

EMPLOYEE NAME	HOURS, EARNINGS,	REIMBURSEN	IENTS & OTHER	PAYMENTS	WITHHOLDINGS	DEDUCTIONS	NET PAY	
ID	DESCRIPTION RATE	HOURS	EARNINGS	REIMB & OTHER PAYMENTS			ALLOCATIONS	
COMPANY TOTALS 9 Person(s) 9 Transaction(s)	Hourly Salary Overtime COMPANY TOTAL	632:4400 160:0000 56;2400 848:6800	8,063.34 5,500;00 1,055;60 14,618:94		Social Security   906;37   Medicare   211;98   Fed Income Tax   1,072;80   2,191:15   Employer Liabilities		Check Amt         12,427.79           Net Pay         12,427.79	
					Social Security   906;38   Medicare   211:96   Fed Unemploy   87:72   TX Unemploy   33;62   TX UOA,ETIA   14:62			
				TOTAL	EMPLOYER LIABILITY 1,254;30 TOTAL TAX LIABILITY 3,445;45			
(IC) = Independent Contractor								



### **PAYROLL JOURNAL**

0942 1815-8613 Van Scoit Group LLC

EMPLOYEE NAME	HOURS,	REIMBURSEN	IENTS & OTHER	PAYMENTS	WITHHOLDINGS		DEDUCTIONS	NET PAY		
ID	DESCRIPTION	N RATE	HOURS	EARNINGS	REIMB & OTHER PAYMENTS				ALLOCATI	ONS
**** 1 CASHIER-SD Sanchez, Arturo 315	Hourly	14.0000	35,5400	497.5		Social Security Medicare	30:85 7:22		Check # Unknown Check Amt	459.49
	EMPLC	YEE TOTAL	35,5400	497.5	6		38:07		Net Pay	459.49
**** 2 TEAM LEADER Benavides, Luis 120	Hourly Overtime	14,0000 21,0000	119,4900 5,2200	1,672.8 109.6	6 2	Social Security Medicare Fed Income Tax	110,51 25,85 96,78		Check # Unknown Check Amt	1,549.34
	EMPLC	YEE TOTAL	124,7100	1,782,4	3		233 14		Net Pay	1,549,34
**** 3 MANAGER Van Scoit, Julio C 310	Salary			800.0	0	Social Security Medicare	49.60 P> 11.60	(401 EEPRE 24:00	Check # Unknown Check Amt	714.80
	EMPLC Other Items: (Do no	YEE TOTAL	y.)	800,0	D		61,20	24.00	Net Pay	714.80
	PX401 ERMTCH				24.00					
/an Scoit, Valeri 300	Salary			800.0	0	Social Security Medicare	49,60 11.60		Check # Unknown Check Amt	738.80
	EMPLO	YEE TOTAL		800:0	0		61,20		Net Pay	738,80
**** 4 KITCHEN-SD Lopez, Elizabeth 180	Hourly	14.5000	118.4800	1,717.9	6	Social Security Medicare Fed Income Tax	106:52 24:91 127:75		Check # Unknown Check Amt	1,458.78
	EMPLC	YEE TOTAL	118.4800	1,717,9	6		259;18 134:04		Net Pav	1,458,78
Patino, Emilia 240	Hourly Overtime	15.0000 22.5000	127.0700 11.3700	1,906.0 255.8	5 3	Social Security Medicare Fed Income Tax	134:04 31:35 162:16		Net Pay Check # Unknown Check Amt	1,834.33
	EMPLC	YEE TOTAL	138.4400	2,161,8	3		327 55		Net Pay	1,834,33
**** 6 <b>STAFF</b> Fraire, Joanna 175826	Hourly Overtime	14.0000 21.0000	40.0000 4.1400	560.0 86.9		Social Security Medicare Fed Income Tax	40:11 9:38 7:00		Check # Unknown Check Amt	590.45
	EMPL C	YEE TOTAL	44 1400	646.9	4		: 56;49		Net Pay	590 <u>.</u> 45
Garcia, Adrianna 175827	Hourly Overtime	15.0000 22.5000	122,4900 3,8300	1,837,3 86.1	5	Social Security Medicare Fed Income Tax	119:26 27:89 152:42		Net Pay Check # Unknown Check Amt	1,623.96
	EMPLO	YEE TOTAL	126.3200	1,923.5	3		299:57		Net Pav	1,623.96
Hardin, Haylee E 175825	Hourly	10,0000	18,3400	183.4		Social Security Medicare	11:37 2:66		Net Pay Check # Unknown Check Amt	169.37
Hernandez, Jose 424	Hourly	13,0000	18,3400 73,2000	183,4 951.6	0	Social Security Medicare Fed Income Tax	14;03 59:00 13;80 37:47		Net Pay Check # Unknown Check Amt	169:37 841:33



**0942 1815-8613** Van Scoit Group LLC

EMPLOYEE NAME	HOURS, EARNINGS, REIMBURSEMENTS & OTHER PAYMENTS						WITHHOLDINGS	DEDUCTIONS	NET PAY	
ID	DESCRIPTION R	ATE	HOUR	s	EARNINGS	REIMB & OTHER PAYMENTS			ALLOCATIONS	
**** 6 STAFF (cont.) Hernandez, Jose (cont.) 424	EMPLOYEE TO	TAL	73.	2000	951,60		110;2	7	Net Pay 841;33	
COMPANY TOTALS 10 Person(s) 10 Transaction(s)	Hourly Salary Overtime COMPANY TOTAL Other Items: (Do not increase PX401 ERMTCH	Net Pa	679	5600	9,326,78 1,600:00 538;57 11,465;35	1	Medicare 166;2 Fed Income Tax 583;5 1,460;7	6PX401 EEPRE 24:00 68 0 24:00	Check Amt         9,980.65           Net Pay         9,980.65	
						TOTAL	Employer Liabilities           Social Security         710.8           Medicare         166.2           Fed Unemploy         68.7           TX Unemploy         22.9           TX UOA,ETIA         12.6           EMPLOYER LIABILITY         981.4           TOTAL TAXLIABILITY         2,442.1	5 9 3 2 4		
(IC) = Independent Contractor										



Label Matrix for local noticing 0539-4 Case 25-40642-elm11 Northern District of Texas Ft. Worth Tue Feb 25 00:48:27 CST 2025 1900 Shreeji, Inc. 2123 Hogan Drive Irving, TX 75038-5938 Van Scoit Services LLC 8820 Trinity Vista Trl Hurst, TX 76053-7522

6237 RUFE SNOW, LLC

Fort Worth, TX 76148-3316

6237 Rufe Snow

501 W. Tenth Street Fort Worth, TX 76102-3637

**Brothers Produce** 

P.O. Box 550278

Dallas, TX 75355-0278

Christon Company 4445 Alpha Road, Suite 109

Dallas, TX 75244-4507

Dallas County Tax-Assessor Collector 500 Elm Street Dallas, TX 75202-3304 Fox Funding Group, LLC 803 S 21 Street Hollywood, FL 33020-6962

Internal Revenue Service Centralized Insolvency Operations P.O. Box 7346 Philadelphia, PA 19101-7346 Joe Lieberman PO Box 356 Cedarhurst, NY 11516-0356 Julio Van Scoit 8820 Trinity Vista Trl Hurst, TX 76053-7522

MCFARLAND RETAIL PROPERTIES, LLC 3328 East Hebron Carrollton, TX 75010-4446 McCarron & Diess 4530 Wisconsin Ave 301 Washington, DC 20016-4667 North Mill Credit Trust Norwalk, CT 06851 601 Marritt 7, Ste 5

Office of the United States Trustee Earle Cabell Federal Building 1100 Commerce Street Room 976 Dallas, TX 75242-1011

Parkside Center LLC 4445 Alpha Rd, Suite 10 Dallas, TX 75244-4507 Paychex 1175 John St W Henrietta, NY 14586-9199

Pride Commercial Properties 6220 Campbell Rd. Ste. 104 Dallas, TX 75248-1396 Schlotzsky's 200 Glenridge Point Pkwy Atlanta, GA 30342-1449 Steve Mylius 2924 Haltom Rd Haltom City, TX 76117-4458

Texas Attorney General's Office Bankruptcy Collection Division PO Box 12548 Austin, TX 78711-2548 Texas Comptroller of Public Account C/O Office of the Attorney General Bankruptcy-Collections Division PO Box 12548, MC-008 Austin, TX 78711-2548 (p) TEXAS COMPTROLLER OF PUBLIC ACCOUNTS
REVENUE ACCOUNTING DIV - BANKRUPTCY SECTION
PO BOX 13528
AUSTIN TX 78711-3528

United States Attorney Northern District of Texas 1100 Commerce Street, 3rd Fl. Dallas, TX 75242-1074 United States Trustee 1100 Commerce Street Room 976 Dallas, TX 75242-0996 Valerie Van Scoit 8820 Trinity Vista Trl Hurst, TX 76053-7522

Westbrooke Capital, Ltd. 6360 N Beach St Fort Worth, TX 76137-2622 Robert Thomas DeMarco Robert Demarco 12770 Coit Road Suite 850 Dallas, TX 75251-1364 The preferred mailing address (p) above has been substituted for the following entity/entities as so specified by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g) (4).

Texas Comptroller of Public Accounts	End of Label Matrix	
Bankruptcy Section	Mailable recipients	28
Po Box 13528	Bypassed recipients	0
Austin, TX 78711-3528	Total	28

Label Matrix for local noticing 0539-4 Case 25-40641-mxm11 Northern District of Texas Ft. Worth Tue Feb 25 00:47:55 CST 2025

Bank United, N.A. Small Business Finance 7815 NW 148th Street Miami Lakes, FL 33016-1554

Julio Van Scoit 8820 Trinity Vista Trl Hurst, TX 76053-7522

Newtek Small Business Finance, Inc. 1981 Marcus Ave. Ste. 130 New Hyde Park, NY 11042-1046

Schlotzsky's 200 Glenridge Point Pkwy Atlanta, GA 30342-1449

Texas Comptroller of Public Account C/O Office of the Attorney General Bankruptcy-Collections Division PO Box 12548, MC-008 Austin, TX 78711-2548

Valerie Van Scoit 8820 Trinity Vista Trl Hurst, TX 76053-7522

End of Label Matrix
Mailable recipients 20
Bypassed recipients 0
Total 20

Van Scoit Group LLC 8820 Trinity Vista Trl Hurst, TX 76053-7522

Dallas County Tax-Assessor Collector 500 Elm Street Dallas, TX 75202-3304

Kapitus 2500 Wilson Boulevard, Suite 350 Arlington, VA 22201-3873

Office of the United States Trustee Earle Cabell Federal Building 1100 Commerce Street Room 976 Dallas, TX 75242-1011

TXU Energy/ Bankruptcy PO Box 650393 Dallas, TX 75265-0393

United States Attorney Northern District of Texas 1100 Commerce Street, 3rd Fl. Dallas, TX 75242-1074

Van Scoit AM Restaurants LLC 8820 Trinity Vista Trl Hurst, TX 76053-7522 Internal Revenue Service Centralized Insolvency Operations P.O. Box 7346 Philadelphia, PA 19101-7346

NCR Voyix Corporation 864 Spring St. NW Atlanta, GA 30308-1007

501 W. Tenth Street

Fort Worth, TX 76102-3637

Rapid Finance 4500 East West Highway 6th Floor Bethesda, MD 20814-3327

Texas Attorney General's Office Bankruptcy Collection Division PO Box 12548 Austin, TX 78711-2548

United States Trustee 1100 Commerce Street Room 976 Dallas, TX 75242-0996

Robert Thomas DeMarco Robert Demarco 12770 Coit Road Suite 850 Dallas, TX 75251-1364